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June 10, 2024

VIA ECF

Hon. Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: *Delana Brandon v. Sensio, Inc.*, No. 1:24-cv-02859-RA
Letter Motion for Extension of Time to Respond to the Complaint and Adjournments of
the Initial Conference and Deadline to Submit a Proposed Case Management Plan

Dear Judge Abrams:

We represent Defendant Sensio, Inc. (“Sensio”) in the above-referenced action.

Pursuant to § 1(D) of the Court’s Individual Rules & Practices, we write to request that the Court order a revised briefing schedule for Sensio’s forthcoming motion to dismiss, which includes a two-week extension of Sensio’s deadline to answer, move, or otherwise respond to Plaintiff’s Complaint from June 24, 2024 until July 8, 2024. The proposed schedule is as follows:

- July 8, 2024: Sensio’s motion to dismiss;
- August 9, 2024: Plaintiff’s opposition;
- August 30, 2024: Sensio’s reply.

Sensio seeks this extension because this past weekend, its lead counsel underwent a family medical emergency that is continuing in nature and will need additional time to prepare Sensio’s response. This is Sensio’s second request for an extension, and Sensio’s first request was granted. *See* ECF Nos. 9, 10. This extension will not affect any other scheduled dates. The parties have conferred and Plaintiff consents to Sensio’s request.

Further, pursuant to § 1(D) of the Court’s Individual Rules & Practices and the Court’s Order and Notice of Initial Conference dated April 19, 2024 (ECF No. 5), the parties jointly request that the Court adjourn the Initial Conference from June 21, 2024 to a date on or after July 19, 2024 to be determined by the Court. Plaintiff’s lead counsel has a scheduling conflict on June 21st and will be unable to attend the Initial Conference, and a date on or after July 19, 2024 will



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accommodate pre-planned absences and scheduling conflicts for both parties. The parties also request that the Court adjourn the parties' deadline to file a proposed case management plan from June 14, 2024, *see* ECF No. 5 at 2, to a deadline one week before the Initial Conference, once that date is set. This is the parties' first request for an adjournment of these deadlines and this adjournment will not impact any other scheduled dates. The parties have conferred and consent to these requests.

We appreciate the Court's consideration of this letter motion, and we will make ourselves available at the Court's convenience should the Court have any questions.

Respectfully submitted,

/s/ Colleen Carey Gulliver

Colleen Carey Gulliver

cc: All counsel of record (by ECF)

Application granted.

The initial pre-trial conference, currently scheduled for June 21, 2024, is hereby adjourned until July 19, 2024 at 4:45 p.m. (Conference Number: 888-363-4749, Passcode: 1015508#)

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'R. Abrams', written over a horizontal line.

Hon. Ronnie Abrams
June 11, 2024